

EXHIBIT 8

PERSONAL INFORMATION REDACTED

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION, Case No.
3:23-md-03084-CRB

This Document Relates to:
Jaylynn Dean v. Uber Technologies,
Inc., et al., 3:23-cv-06708

VIDEOTAPED DEPOSITION OF JAYLYNN DEAN
TAKEN ON BEHALF OF THE DEFENDANTS
ON JUNE 27, 2025, BEGINNING AT 9:21 A.M. CST
IN TULSA, OKLAHOMA

VIDEOTAPED BY: Lauren Kinnebrew
REPORTED BY: D. Luke Epps, CSR, RPR
Job No. CS7360417

1 A Yes.

2 Q Okay. We can set that aside for now. I
3 want to just do some general background information
4 to ease our way into today. Can you provide your
5 date of birth, please? Or, I'm sorry, yes, date of
6 birth.

7 A Yes. It's [REDACTED].

8 Q [REDACTED]

9 [REDACTED]

10 A [REDACTED]

11 Q Currently 20 years old?

12 A Yes.

13 Q Okay. And where were you born?

14 A In Texas.

15 Q Where in Texas?

16 A Port Lavaca, Texas.

17 Q And did you grow up in Texas?

18 A Yes.

19 Q How long did you live in Port Lavaca,
20 Texas?

21 A About a couple of months.

22 Q Okay. And then where did you move after a
23 couple of months, if you recall?

24 A Victoria, Texas.

25 Q Okay. And how long were you in Victoria,

1 So it was really quick. Same thing, the second time
2 was a hockey game in Dallas, and I was with my
3 friend, and it was really quick, but both times were
4 female drivers.

5 Q And those were when you used the Uber app
6 to call those Ubers?

7 A Yes.

8 Q And was there a reason that you used Uber
9 in those instances as opposed to Lyft or Waymo?

10 A Because there weren't any Lyft drivers
11 in -- weren't any Lyft drivers in Stillwater that I
12 saw, and then Elisa, my friend, she was who I was
13 with at the hockey game, and she just ordered the
14 Uber off my phone because she didn't have the app.

15 Q When you downloaded -- first downloaded
16 the app in November of 2023, do you recall whether
17 or not you did any research about Uber?

18 MS. ABRAMS: Object to form.

19 THE WITNESS: No. I just -- I heard
20 things about it. Like I said, I downloaded three
21 ride share apps. It was kind of just if I didn't
22 have one, it's like I wanted a backup option, you
23 know, and feel like Uber is a pretty big one, so I
24 just downloaded it. That's the first one that
25 popped up.

1 Q (BY MS. BLAKE) Do you recall whether you
2 looked into what, if any, safety features that Uber
3 had available when you downloaded the app?

4 A No. Whenever I had the app, I think it,
5 like, did a little walk-through and it told me about
6 what it had. I believe, like, if your ride stops,
7 it will have a pop-up. I kind of just always heard
8 that, you know, it was, like, it was safe, like, if
9 you've been drinking, if you've been going out or
10 you don't have a ride. I didn't really do my own
11 research. Just what I heard and what I had seen.

12 Q Do you recall where you had heard or seen
13 these things that you're referencing about Uber?

14 A Like TikTok and friends. I went to
15 college and so people used it pretty frequently
16 there if they had been drinking.

17 Q You mentioned the pop-up that Uber sends
18 if you stopped. Were you aware of any other safety
19 features that Uber had when you first downloaded the
20 app?

21 A No. Just that you can make reports if you
22 wanted to, but no other safety features.

23 Q Were you aware that you could set up a
24 Share Your Trip details and allow friends or family
25 to track you in the Uber app?

1 A No.

2 Q Were you aware of the Trusted Contacts
3 feature that allowed riders to automatically use
4 Share My Trip with friends or family members?

5 A No.

6 Q Were you aware of the driver profile
7 feature which permits a rider to evaluate the driver
8 before taking the ride?

9 A Yes.

10 Q One thing I want to clarify, you stated
11 that [REDACTED] is who called the Uber for
12 you; correct?

13 MS. ABRAMS: Object to form.

14 THE WITNESS: Yes.

15 MS. BLAKE: Okay. I want to go ahead and
16 mark these. Am I on Exhibit 10?

17 THE COURT REPORTER: Yes.

18 Q (BY MS. BLAKE) These are a series of
19 documents. I'm not going to ask you about each one,
20 but we can go ahead and just pass them all to you,
21 and these are documents that you produced?

22 (Exhibit 10 marked for identification.)

23 A Yes.

24 Q If you turn to page 3, is this a screen
25 image of your phone?

1 A No.

2 Q Were you aware of the emergency assistant
3 feature that allows a rider to call or, where
4 available, text 911 straight from the app?

5 A No.

6 Q Were you aware of the on-trip reporting
7 feature that allows riders to discreetly report a
8 non-emergency safety issue during the ride?

9 A No.

10 Q How often since 2023 in a given month do
11 you use a ride share app, if you can estimate?

12 A Just in the past year alone, I've -- while
13 I've been home, I've used it twice. Before that, it
14 was a little more frequent. I finished training the
15 second round in January, and then I only used it for
16 one or two months because I moved in with roommates
17 who had cars, but in the past year I've only used it
18 twice.

19 Q Okay. Prior to the incident at issue in
20 the lawsuit on November 15, 2023, had you seen any
21 advertisements for Uber?

22 A Yes.

23 Q Can you tell me about those?

24 A I had seen Instagram posts, Facebook
25 pop-ups, just even like on my app store, I remember

1 it advertised Uber. Just basically advertising it
2 as a safe option, you know, if you've been drinking
3 or, you know, you needed a ride and didn't have one,
4 but I had just seen it on social medias.

5 Q Do you recall whether or not those were
6 posts from Uber or posts about Uber?

7 A Both.

8 Q Okay. What do you recall about the ones
9 specifically from Uber?

10 A About, like I said, if you needed a safe
11 ride or if you had been drinking, I had seen those
12 from Uber before. I'm on Facebook a lot, so a lot
13 of them were on Facebook.

14 Q Okay. Now I want to kind of talk about
15 the events leading up to the incident on
16 November 15th, 2023. So I want to kind of start the
17 day before, November 14th, 2023. I believe you
18 already have the supplemental responses to the
19 interrogatories, your first supplemental responses
20 to Uber's interrogatories. Do you see those? Those
21 were -- I believe it's -- if I may pause, I believe
22 it's -- maybe I didn't hand those to you yet. I
23 don't think I did. My apologies. I did not. Now
24 we're on Exhibit 11. Handing you now what I'm now
25 marking as Exhibit 11, which is your first

1 A Okay.

2 Q Do you believe -- and we talked about what
3 you believe that Uber should have done with respect
4 to safety features. Do you believe that Uber should
5 have given you some warning of some kind?

6 MS. ABRAMS: Object to form.

7 THE WITNESS: Yes.

8 Q (BY MS. BLAKE) Okay. And what do you
9 believe they should have given you a warning about?

10 A I think -- I mean, I -- I've never used
11 Uber, so I can't say anything -- well, prior to
12 this, I hadn't used Uber, but like I said, I've used
13 it other times, and I think just kind of warning
14 you. You know, it's not 100 percent safe. I've
15 always seen pictures and posts and ads about how
16 it's a safe option, but, I mean, what I went through
17 shows that's not always the case.

18 Q Have you ever seen an ad that said it was
19 100 percent safe? You just referenced that, so I
20 wanted to make sure.

21 A No. Just saying that it was safe.

22 Q Okay.

23 A But I've never seen anything about the
24 potential risks.

25 Q And do you have any understanding of what